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Ko [Request for Durability Group Determination BlueTEC
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Dr. Ralph Kofler

05-06-2010

Request for Approval of Durability Group Determination of the MY2011 BlueTEC models

Dear Mr. Nevers

For MY2011 we will certify the following "BlueTEC" models for the U.S. market equipped with the same diesel-engine:

Test Group	Model Name	Exh. Use
BMBXT03.0U2A	ML 350 BLUETEC 4MATIC	FEDV
	R 350 BLUETEC 4MATIC	EDV
BMBXT03.0U2B	GL 350 BLUETEC 4MATIC	EDV
BMBXV03.0U2B	E 350 BLUETEC	EDV

Durability Grouping:

According to CFR 86.1820-01 (b) above listed models are identical regarding to:

- Combustion cycle
- Engine Type
- Fuel used
- Basic metering system
- Catalyst construction

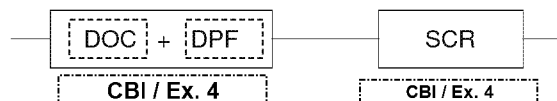
The aftertreatment system of the BlueTEC models consists out of three components, namely a Diesel Oxidation Catalyst (DOC), a Diesel Particulate Filter (DPF) and a Selective Catalytic Reduction (SCR)-Converter. The DOC and DPF are canned together in one can.

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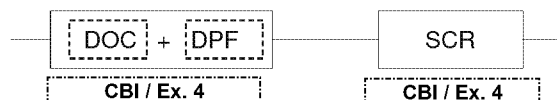
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The following precious metal compositions are applied to the components:

ML/R/GL 350 BlueTEC



E 350 BlueTEC



Although the E350 BlueTEC will have an additional CBI / Ex. 4 coating, which cannot be found in the DOC of the ML/R/GL 350 BlueTEC 4MATIC, we kindly ask for approval for grouping all models in one durability group according to CFR 86.1820-01 (e):

Durability Group	DDV	GS	Test Group	Model Name	Exh. Use
BMBXDPDNNPP1	X164-889-X164D30TC_c/o	CBI / Ex. 4	BMBXT03.0U2A	ML 350 BLUETEC 4MATIC	FEDV
				R 350 BLUETEC 4MATIC	EDV
			BMBXT03.0U2B	GL 350 BLUETEC 4MATIC	EDV
			BMBXV03.0U2B	E 350 BLUETEC	EDV

Reasons for durability grouping:

1. Grouping statistic:

The grouping statistic of the engine-emission control system combinations is within 25% percent of the largest GS value.

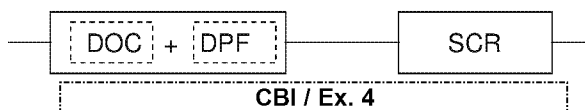
2. Degree of emission deterioration / component durability:

The deterioration factors are derived from the GL350 BlueTEC 4MATIC at an ETW of 6.000 lbs. The E-class will be certified at an ETW of 4.500 lbs. Furthermore the additional CBI / Ex. 4 coating in the E-class DOC will have a positive influence on the degree of emission deterioration. Therefore the DF's derived from the GL have to be regarded as the worst case DF's to be determined. These worst case DF's will be applied to the E-class.

To prove the statement above Mercedes-Benz gives the following evidence:

The exhaust system of the Dodge/Freightliner 3500 (4,53t) uses the same exhaust aftertreatment system (including SCR technology) as the ML/R/GL350 BlueTEC 4MATIC models but has an additional CBI / Ex. 4 coating in the DOC. So the precious metal composition is the same as in the E-class DOC:

Dodge/Freightliner 3500 (4,53t)



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The Grouping Statistic of the Dodge/Freightliner is in comparison to the GL350 BlueTEC 4MATIC test group, which is . Therefore the aftertreatment systems are comparable.

The following deterioration factors have been determined for the DOC relevant emissions THC and CO:

GL350 BlueTEC			Dodge/Freightliner 3500 (4,53t)		
DF Add	Mileage type	Emission Component	DF Add	Mileage type	Emission Component
0	4	CO	0	4	CO
0,03	50	CO	0	50	CO
0,06	100	CO	0	100	CO
0,07	120	CO	0	120	CO
0,09	150	CO	0,1	150	CO
0	4	THC	0	4	THC
0,0012	50	THC	0,0004	50	THC
0,0027	100	THC	0,0009	100	THC
0,0042	120	THC	0,0013	120	THC
0,0057	150	THC	0,0018	150	THC

Conclusion:

Although the Dodge/Freightliner DF's were derived at an ETW of 8.500 lbs (GL350 BlueTEC 4MATIC: 6.000 lbs), the DF's for the DOC relevant emissions (THC/CO) are similar respectively better than the DF's derived for the GL350 BlueTEC.

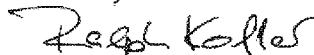
Applying good engineering judgement it can be concluded, that the additional coating in the DOC of the E350 BlueTEC will also have a similar respectively better degree of deterioration than the DOC of the GL350 BlueTEC 4MATIC.

3. In-use verification:

As the E350 BlueTEC forms a test group of its own, the in-use program can be applied providing the possibility of clear vehicle tracking and liability for the Agency's recall program.

Your approval will be highly appreciated.

Sincerely



Dr. Ralph Kofler